

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13
KEITH M. WOODSON :
DEBTOR :
: CASE: 16-17313-MDC
: :
NATIONSTAR MORTGAGE LLC :
MOVANT :
VS. :
KEITH M. WOODSON :
RESPONDENT :
AND :
WILLIAM C. MILLER :
TRUSTEE :
:

OBJECTION TO CERTIFICATION OF DEFAULT

The Debtor, Keith Woodson, by his counsel, hereby objects to the Certification of Default filed by Nationstar Mortgage LLC in the above-captioned case. The grounds for his objection are as follows:

1. The Certification of Default was filed erroneously as the Debtor did not receive any written notice of the default of the Stipulation of Settlement which was approved by the Court on March 9, 2017.
2. Debtor is ready, willing and able to cure any alleged default by a) providing a lump sum payment on June 30, 2018; and/or b) including the alleged post petition arrears into an amended chapter 13 repayment plan.

WHEREFORE, the Debtor prays that the Certification of Default be denied.

Respectfully submitted,

Stephen M. Dunne, Esquire
/s/ Stephen M. Dunne
Attorney for Debtor